

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHAWANDA HUTSON,

Plaintiff,

v.

CHICAGO STEAM BASKETBALL, LLC,

Defendant.

Case No. 14-cv-01674

Honorable John Z. Lee

MOTION FOR ORDER TO SHOW CAUSE

NOW COMES the Plaintiff, SHAWANDA HUTSON, by and through her undersigned attorneys, and in support of her Motion for an Order to Show Cause, states as follows:

1. Plaintiff initiated these proceedings on March 11, 2014, seeking recovery from Defendant, CHICAGO STEAM BASKETBALL, LLC, for violations of Title VII and violations of the Illinois Wage Payment and Collection Act.

2. On October 10, 2014, this Court entered a judgment against the Defendant in the amount of \$22,230.00. That judgment remains unsatisfied.

3. On July 7, 2015, this Court granted Plaintiff's Motion for the issuance of a citation to discover the Defendant's assets.

4. On July 9, 2015, Plaintiff mailed the Citation and the Rider to the Citation (*see* Exhibit 1, attached), via FedEx, to Ron Hicks, the owner of the corporation, at the corporation's address, as well as to the corporation's agent of service, United States Corporation Agent, via FedEx. *See* Exhibit 2, attached. Plaintiff also formally served the Citation and Rider via a licensed process server and received confirmation that the documents were signed for by a

secretary for the corporation, who indicated she was authorized to accept service. *See* Exhibit 3 (attached).

5. On August 4, 2015, Plaintiff mailed a letter to Ron Hicks (President and Owner of Defendant) and to United States Corporation Agent, advising the Defendant to respond to the Citation to Discover Assets or Plaintiff would proceed with the present Motion. *See* Exhibit 4 (attached).

6. To date, the Defendant has not replied or responded in any way to Plaintiff's Requests and has not provided any documents in response.

WHEREFORE, Plaintiff, SHAWANDA HUTSON, respectfully requests as follows:

1. That the Court grant the Motion for the Issuance of an Order directing the Defendant to Show Cause as to why it should not be held in contempt of court for its failure to respond to a Citation to Discover Assets served upon it as provided by law.
2. That Defendant be ordered to produce all books, papers, or records set forth in the Citation to Discover Assets within the next 14 days.
3. That the Court grant any other relief it deems just and necessary.

RESPECTFULLY SUBMITTED,

By: /s Maryam Arfeen
Attorney for Plaintiff

LEONARDMEYER LLP
Michael I. Leonard
Ethan E. White
Maryam Arfeen
203 N. LaSalle Street, Suite 1620
Chicago, Illinois 60601
(312) 374-8084 (direct)
(312) 264-0671 (fax)
marfeen@leonardmeyerllp.com

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHAWANDA HUTSON,

Plaintiff,

v.

CHICAGO STEAM BASKETBALL, LLC,

Defendant.

Case No. 14-cv-01674

Honorable John Z. Lee

CITATION TO DISCOVER ASSETS

TO: CHICAGO STEAM BASKETBALL, LLC

YOU ARE COMMANDED to appear before Judge Lee or any other judge sitting in his stead in room 1226 of Northern District of Illinois Federal Courthouse, Everett McKinley Dirksen Building, 219 S. Dearborn St., Chicago, Illinois on **AUGUST 24, 2015 at 9:00 AM** to be examined under oath to discover assets or income not exempt from the enforcement of the Judgment.

A judgment against Chicago Steam Basketball, LLC ("Judgment Debtor") was entered on October 10, 2014 and \$22,230.00 remains unsatisfied.

YOU ARE COMMANDED to produce at the examination:

SEE ATTACHED DOCUMENT RIDER

and all books, papers, or records in your possession or control which may contain information concerning the property or income of, or indebtedness due Judgment Debtor.

YOU ARE PROHIBITED from making or allowing any transfer or other disposition or, interfering with, any property not exempt from execution or garnishment belonging to the Judgment debtor or to which the Judgment Debtor may be entitled or which may be acquired by or become due to the Judgment Debtor and from paying over or otherwise disposing of any money not so exempt, which is due the Judgment Debtor, until the further order of court or termination of the proceedings. You are not required to withhold the payment of any money beyond double the amount of the balance due.

WARNING: YOUR FAILURE TO APPEAR IN COURT AS HEREIN DIRECTED MAY CAUSE YOU TO BE ARRESTED AND BROUGHT BEFORE THE COURT TO ANSWER TO A CHARGE OF CONTEMPT OF COURT, WHICH MAY BE PUNISHABLE BY IMPRISONMENT IN THE COUNTY JAIL. YOUR FAILURE TO COMPLY WITH THE CITATION PROCEEDING MAY RESULT IN A JUDGMENT BEING ENTERED AGAINST YOU FOR THE UNSATISFIED AMOUNT OF THE JUDGMENT. 735 ILCS 5/2-1402(c)(1)

CERTIFICATE OF ATTORNEY OR JUDGMENT CREDITOR

In the United States District Court for the Northern District of Illinois, on October 10, 2014, a judgment in the amount of **\$22,230.00** was entered in favor of SHAWANDA HUTSON and against CHICAGO STEAM LIMITED, LLC in Case No. 14-cv-01674 and a balance of **\$22,230.00** remains unsatisfied.

I, the undersigned, certify to the Court, under penalties as provided by law pursuant to 735 ILCS 5/1-190 that all information stated herein is true.

By: /s Maryam Arfeen
Maryam Arfeen
One of Plaintiff's Attorneys

Atty. No: 6316640
Name: Maryam Arfeen
Address: 203 N. LaSalle, Suite 1620
City/State/Zip: Chicago, IL 60601
Telephone: (312) 374-8084

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHAWANDA HUTSON,

Plaintiff,

v.

CHICAGO STEAM BASKETBALL, LLC,

Defendant.

Case No. 14-cv-01674

Honorable John Z. Lee

RIDER TO CITATION TO DISCOVER ASSETS

YOU ARE COMMANDED to produce at the examination all books, papers, documents, or records in your possession over which you have control, which may contain information concerning all property and assets of Chicago Steam Basketball, LLC, including but not limited to:

1. Any and all monthly, quarterly, annual and/or all other accounting and financial statements, including but not limited to payroll and accounts receivable records, prepared by or on behalf of Chicago Steam Basketball, LLC for the past three years.

2. Any and all information regarding any and all stocks, funds, bonds, securities and/or other investments or other assets held, gained, sold or lost by Chicago Steam Basketball, LLC, or otherwise associated with Chicago Steam Basketball, LLC in any way for the past three years;

3. Any and all information regarding all bank, money or other financial accounts, including but not limited to bank statements and check ledgers, in the name of Chicago Steam Basketball, LLC, and/or its officers and/or directors, along with such information for Chicago

Steam Basketball, LLC's subsidiaries, successors or other related entities; for all such information, provide the name of the accounts, account numbers, amount of money currently held in each account and monthly statements for each said account for the past three years;

4. Copies of all income tax returns filed for the past three years, on behalf of Chicago Steam Basketball, LLC, along with copies of any and all tax refund checks issued during these years, and any and all information regarding how such refund money was used and/or where such money was held and is currently being held, whether by Chicago Steam Basketball, LLC and/or any other entity or individual affiliated or associated in any way with Chicago Steam Basketball, LLC;

5. Any and all information regarding any and all loan documents related to Chicago Steam Basketball, LLC, including any and all documents related to any receipts or disbursements of money related to such loans, for the past three years.

6. A list of all assets regardless of their present location.

7. A list of all liabilities regardless of their present location.

8. Audited financial statements for the last five years.

SHAWANDA HUTSON

By: _____
One of Her Attorneys

LeonardMeyer LLP
Michael I. Leonard
Ethan E. White
Maryam Arfeen
203 North LaSalle Street
Suite 1620
Chicago, Illinois 60601
(312) 283-0747

Exhibit 2

NOT A SHIPPING FORM. PROCESS IN CENTER ONLY. NOT A SHIPPING FORM. PROCESS IN CENTER ONLY.

FEDEX EMPLOYEE: PEEL HERE



Order Form

Must be processed at a FedEx shipping counter.

1 From Please print and press hard.

Sender's FedEx Account Number 647-800467

Sender's Name MARYAM ARFESON Phone (312) 374-8054

Company LEONARD AMBERLUP

Address 203 N. CASALE SUITE 1620

City CHICAGO State IL ZIP 60601

Address CHICAGO State IL ZIP 60601

2 To Recipient's Name RON HICKS Phone

Company CHICAGO STEAM

Address 500 N. MICHIGAN AVE STE 600

City CHICAGO State IL ZIP 60611

Country USA State IL ZIP 60611

Address CHICAGO State IL ZIP 60611

Country USA State IL ZIP 60611

3 Package Information

☐ Residential Delivery Address ☒ Nonresidential (Business) Delivery Address

Number of Packages 1 Weight Declared Value \$

Our liability is limited to \$100 per package unless you declare a higher value. See back for details. Declared value of \$500 or more will default to Direct Signature required. For multiple packages to one delivery address, see the shipping agent to declare a value for each package.

The FedEx Ground Order Form is for FedEx Ground shipments within the U.S. and for FedEx International Ground shipments from the U.S. to Canada. By using this FedEx Ground Order Form, you agree to the service conditions on the back of the Sender's Copy of this document and in the current FedEx Service Guide, including terms that limit our liability. Hazardous materials cannot be shipped using this FedEx Ground Order Form.

4 Delivery Signature Options

If you require a signature, check Direct or Indirect.

☒ No Signature Required ☐ Direct Signature ☐ Indirect Signature

Signature may be left without obtaining a signature for delivery. Fee applies. If no one is available at delivery address, sign for delivery. Available for U.S. residential shipments only. Fee applies.

5 FedEx Home Delivery® Convenient Delivery Options

U.S. residential deliveries for packages up to 70 lbs.

☐ FedEx Date Certain ☐ FedEx Evening ☐ Home Appointment

Delivery on a specific date you select. Delivery between 5 and 9 p.m. on the scheduled date of delivery. Fee applies. Delivery on a specific date and time you select. We attempt to contact the recipient in advance. Fee applies.

Fee applies.

6 Payment

Bill transportation charges to:

☐ Sender ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check

Enter FedEx Acct. No. below.

7 FedEx International Ground Information

Commodity Description REQUIRED

Value for Customs REQUIRED

Total Value for Customs USD

Bill duties and taxes to:

☐ Sender ☐ Recipient ☐ Third Party

ALL FedEx International Ground shipments may be subject to duties and taxes, which FedEx does not estimate prior to clearance.

FedEx Acct. No.

FedEx Use Only \$ Base Rate \$ Total Charge

Tracking Number

Employee Number

5877938

Exhibit 3

Affidavit of Process Server

14CV1679

Shawanda Hutson
Plaintiff/Petitioner

vs Chicago Steam Basketball, LLC
Defendant/Respondent

Case#

Being duly sworn, on my oath, I TRINITY McHATTEN
declare that I am a citizen of the United States, over the age of eighteen and not a party to this action.

Service: I served Konficks

NAME OF PERSON/ENTITY BEING SERVED

with the (documents)

☐ Subpoena with \$ _____ witness fee and mileage

☒ Citation to Discover Assets & Rider

by serving (NAME)

at ☐ Home

☒ Business

☐ on (DATE)

SUSAN ABURAHMEH - RECEPTIONIST: AUTHORIZED TO RECEIVE SERVICE

500 N. Michigan Ave Chicago, IL
7/15/15 at (TIME) 2:20 PM

Thereafter copies of the documents were mailed by prepaid, first class mail on (DATE)

From (CITY)

(STATE)

Manner of Service:

☐ By Personal Service

☒ By delivering, during office hours, copies at the office of the person/entity being served, leaving same with the person apparently in charge thereof, namely,

SUSAN ABURAHMEH - AUTHORIZED TO ACCEPT SERVICE

☐ By leaving a copy at the defendant's usual place of abode, with some person of the family or a person residing there, of the age of 13 years or upwards, and informing that person of the general nature of the papers

☐ By posting copies in a conspicuous manner to the address of the person/entity being served.

Non-Service:

After due search, careful inquiry and diligent attempts at the address(es) listed above, I have been unable to effect process upon the person/entity being served because of the following reason(s):

☐ Unknown at Address

☐ Evading

☐ Other: _____

☐ Address does not exist

☐ Service cancelled by litigant

☐ Moved, Left no forwarding

☐ Unable to serve in a timely fashion

Service Attempts:

Service was attempted on: () () () () () ()

DATE TIME

DATE TIME

DATE TIME

() () () () () ()

DATE TIME

DATE TIME

DATE TIME

DATE TIME

Description:

☐ Male

☐ White Skin

☐ Black Hair

☐ White Hair

☐ 14-20 Yrs.

☐ Under 5'

☐ Under 100 Lbs.

☒ Female

☐ Black Skin

☒ Brown Hair

☐ Balding

☒ 21-35 Yrs.

☐ 5'-5'3"

☐ 100-130 Lbs.

☒ Brown Skin

☐ Blond Hair

☐ 36-50 Yrs.

☒ 5'4"-5'8"

☒ 131-160 Lbs.

☐ Glasses

☐ Yellow Skin

☐ Gray Hair

☐ Mustache

☐ 51-65 Yrs.

☐ 5'9"-6'

☐ 161-200 Lbs.

☐ Red Skin

☐ Red Hair

☐ Beard

☐ Over 65 Yrs.

☐ Over 6'

☐ Over 200 Lbs.

OTHER IDENTIFYING FEATURES: _____

State of Illinois County of Cook

Subscribed and sworn to before me

A notary public, this 15 day of July, 2015

Notary Public

SERVED BY

LASALLE PROCESS SERVERS

ILLINOIS PRIVATE DETECTIVE LICENSE# 117-001432



CHARTER MEMBER NATIONAL ASSOCIATION OF PROFESSIONAL PROCESS SERVERS

Affidavit of Process Server

14CV1674

Shawanda Hutson
Plaintiff/Petitioner

vs Chicago Steam Basketball, LLC
Defendant/Respondent

Case#

Being duly sworn, on my oath, I Trinity McWhitten
declare that I am a citizen of the United States, over the age of eighteen and not a party to this action.

Service: I served

Chicago Steam Basketball, LLC

with the (documents)

☐ Subpoena with \$ _____ witness fee and mileage

☒ Citation to Discover Assets & Rider

by serving (NAME)

SUSAN ABURAHMEH (RECEPTIONIST) AUTHORIZED TO ACCEPT SERVICE

at ☐ Home

☐ Business

500 N. MICHIGAN AVE CHGO, IL

☐ on (DATE)

JULY 15, 2015

at (TIME) 2:20 PM

Thereafter copies of the documents were mailed by prepaid, first class mail on (DATE)

From (CITY)

(STATE)

Manner of Service:

☐ By Personal Service

☒ By delivering, during office hours, copies at the office of the person/entity being served, leaving same with the person apparently in charge thereof, namely,

SUSAN ABURAHMEH - AUTHORIZED TO ACCEPT SERVICE

☐ By leaving a copy at the defendant's usual place of abode, with some person of the family or a person residing there, of the age of 13 years or upwards, and informing that person of the general nature of the papers

☐ By posting copies in a conspicuous manner to the address of the person/entity being served.

Non-Service:

After due search, careful inquiry and diligent attempts at the address(es) listed above, I have been unable to effect process upon the person/entity being served because of the following reason(s):

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☐ Address does not exist

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☐ Moved, Left no forwarding

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DATE TIME

DATE TIME

DATE TIME

()

DATE TIME

DATE TIME

DATE TIME

DATE TIME

DATE TIME

DATE TIME

DATE TIME

Description:

☐ Male

☐ White Skin

☐ Black Hair

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☐ 14-20 Yrs.

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☐ Over 65 Yrs.

☐ Over 6'

☐ Over 200 Lbs.

OTHER IDENTIFYING FEATURES:

State of Illinois County of Cook

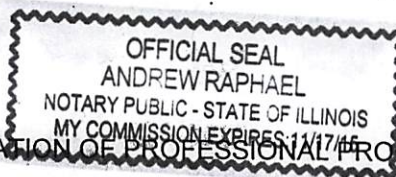
Subscribed and sworn to before me

A notary public, this 15 day of July, 2015

Notary Public

Trinity McWhitten
SERVED BY

LASALLE PROCESS SERVERS
ILLINOIS PRIVATE DETECTIVE LICENSE# 117-001432



CHARTER MEMBER NATIONAL ASSOCIATION OF PROFESSIONAL PROCESS SERVERS

Exhibit 4

LEONARD MEYER

MARYAM ARFEEN
MARFEEN@LEONARDMEYERLLP.COM
O 312.374.8084

August 4, 2015

VIA MAIL

Chicago Steam Basketball
c/o United States Corporation Agen
500 N. Michigan Avenue, Suite 600
Chicago, IL 60611

Re: *Hutson v. Chicago Steam Basketball, LLC*, Case No. 14-cv-01674 - Citation to Discover Assets

To Whom It May Concern:

On July 9, 2015, Chicago Steam Basketball, LLC was served with a Citation to Discover Assets and a Document Rider, pursuant to Judge Lee's July 7, 2015 Order granting Ms. Hutson's Motion for the Issuance of Citation to Discover Assets. In the event that we do not have your compliance with the Citation by August 24, 2015, we will file the appropriate motion, to show cause, to be heard on the following Wednesday, September 3, 2015. Please contact our office regarding Defendant's anticipated compliance with Judge Lee's Order as soon as possible.

Sincerely,



Maryam Arfeen

LEONARD MEYER

MARYAM ARFEEN
MARFEEN@LEONARDMEYERLLP.COM
O 312.374.8084

August 4, 2015

VIA MAIL

Chicago Steam Basketball
c/o CEO/Owner Ron Hicks
500 N. Michigan Avenue, Suite 600
Chicago, IL 60611

Re: *Hutson v. Chicago Steam Basketball, LLC*, Case No. 14-cv-01674 - Citation to Discover Assets

Dear Mr. Hicks:

On July 9, 2015, Chicago Steam Basketball, LLC was served with a Citation to Discover Assets and a Document Rider, pursuant to Judge Lee's July 7, 2015 Order granting Ms. Hutson's Motion for the Issuance of Citation to Discover Assets. In the event that we do not have your compliance with the Citation by August 24, 2015, we will file the appropriate motion, to show cause, to be heard on the following Wednesday, September 3, 2015. Please contact our office regarding Defendant's anticipated compliance with Judge Lee's Order as soon as possible.

Sincerely,



Maryam Arfeen